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6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA  
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9 LIBERTY MEDIA HOLDINGS, LLC )

Case No. \_12-cv-00923-LRH-GWF

10 Plaintiff, )

11 vs. )

**DECLARATION OF HENRY LEONARD IN  
SUPPORT OF PLAINTIFF'S OPPOSITION  
TO MOTION TO DISMISS FOR LACK OF  
PERSONAL JURISDICTION**

12 SERGEJ LETYAGIN, d/b/a )  
13 SUNPORNO.COM; IDEAL CONSULT, )  
14 LTD.; "ADVERT"; "CASTA"; )  
15 "TRIKSTER"; "WORKER"; "LIKIS"; )  
"TESTER" and DOES 1-50 )

16 Defendants )  
17

18 I, HENRY LEONARD, hereby declare under penalty of perjury:  
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20 1. I am over the age of 18 and am a resident of the state of Nevada.

21 2. I am the Certified Public Accountant and Certified Management Accountant for  
22 Plaintiff Liberty Media Holdings (Liberty).

23 3. I am licensed as a Certified Public Accountant in Hawaii, Florida and California.

24 4. I have Ph.D. in Business from Argosy University, a M.B.A., and Bachelors of  
25 Science in Accounting and Management Science.  
26

27 5. I am a member of the American Institute of Certified Public Accountants and the  
28 California Society of Certified Public Accountants.

1           6. I have served as Chief Financial Officer at two companies prior to my  
2 employment at Liberty. These companies operated internationally in Japan, Australia, Canada  
3 and Mexico, requiring me to oversee and ensure compliance with domestic and international  
4 regulations.  
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6           7. I have testified as an expert witness before in *Liberty Media Holdings, LLC v.*  
7 *Vinigay*, Civil Case No. 11-cv-280 (D. Ariz. 2012). This case also dealt heavily with  
8 information regarding the analysis of online enterprises and their profits.  
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10           8. In effort to assist Liberty in this case, I have reviewed some statistical information  
11 provided to me, in order to better understand and portray the Defendants contacts to the United  
12 States.

13           9. The U.S. Census Bureau currently estimates the population of the United States at  
14 311,391,917. They estimate the current population of Nevada as 2,733,322. Accordingly, the  
15 population of Nevada is approximately .88% of the United States population.  
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17           10. Given that the SunPorno.com website is reported by Compete.com to have  
18 3,035,500 unique American visitors in the month of June 2012, it is mathematically appropriate  
19 to determine that it is statistically likely that .88% of those visitors were in Nevada.  
20 Accordingly, 26,712 of those visitors were most likely from Nevada.  
21

22           11. However, it is more likely than not that Nevada is represented to a greater extent  
23 than its mere population percentage. Given that Nevada is a popular tourist destination and is  
24 known for being a place of adult entertainment, it is likely that Nevada represents far more than  
25 .88% of the American traffic.  
26

27           12. I have also reviewed the traffic collection policies for Compete.com, available at:  
28 [http://media.compete.com/site\\_media/upl/img/Compete\\_Data\\_Methodology\\_3.pdf](http://media.compete.com/site_media/upl/img/Compete_Data_Methodology_3.pdf), last visited  
July 19, 2012.

1           13.     Compete.com utilizes a statistical technique similar to multi-variate analysis to  
2 provide harmonization of various panels of information in order to compile their traffic  
3 information. Because this information is based upon mathematically interpreting sample sizes,  
4 the larger the number of visitors to a website, the more likely this information is going to be truly  
5 accurate. Accordingly, Compete.com only considers websites with over 20,000 United States  
6 unique visitors in a single month as being accurately reported.

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8           14.     Utilizing Compete.com, I researched all of the Defendants websites listed in ECFs  
9 1-13 and 1-14 using Compete.com. Attached as Exhibit 5 is a chart demonstrating all of the  
10 United States unique visitors for June 2012. If only those websites that have received over  
11 20,000 unique United States visitors in June 2012 are counted, we can determine that Ideal  
12 Consult's websites received 6,478,455 unique American visitors in that month. Please note that  
13 this number does not include the traffic to the SunPorno.com website.

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15           15.     There are a number of Ideal Consult, Ltd. websites that received American  
16 visitors in June 2012, but did not receive enough unique American visitors to surpass the data's  
17 threshold. While the measurement of their unique visitors may be incorrect, based upon  
18 Compete.com's methodology, it is highly unlikely that any of these sites would have returned  
19 any results if they did not experience at least some American traffic in the month of June.  
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22  
23 Signed this 19 day of July, 2012 in Las Vegas, Nevada.

24  
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27 Henry Leonard  
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